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Attorney for Defendant
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-cr-00151-WBS-1
)	
Plaintiff,)	STIPULATION FOR MODIFICATION OF
)	CONDITIONS OF PRETRIAL RELEASE;
vs.)	PROPOSED ORDER
)	
JOSE CURIEL,)	Hon. Jeremy D. Peterson
)	
Defendant.)	
)	
)	

The defendant, JOSE CURIEL, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Justin Lee, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Curiel's pretrial release to replace Special Condition 14, requiring location monitoring: home detention with location monitoring: curfew. Additionally, the parties request that Special Condition 12, requiring Mr. Curiel's participation in Cognitive Behavioral Therapy, be removed. Mr. Curiel's assigned pretrial services officer approves of the stipulated to and requested modifications and has communicated the approval and proposed modified condition to the parties. The proposed amended conditions of release are submitted with this stipulation as Exhibit A.

Mr. Curiel has been on pretrial release in this district since July 2022, on a \$4,000 unsecured appearance bond. *See* Dkt. 18. Mr. Curiel is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Curiel is currently

1 subject to home detention, and therefore must remain inside his residence except for pre-
2 approved employment; education; religious services; medical, substance abuse, or mental health
3 treatment; attorney visits; court appearances; court ordered obligations; or other activities
4 authorized by the pretrial services officer. In light of Mr. Curiel's history of compliance with all
5 of his conditions and the reduced assessment of flight risk and/or danger in this case, the parties
6 request that **Special Condition 14 be modified to a curfew from 6:00 p.m. to 6:00 a.m., daily.**
7 Additionally, given that the Cognitive Behavioral Therapy program is not currently available in
8 the Spanish language and given that Mr. Curiel has demonstrated continuous compliance with
9 his release conditions and has had no positive drug test results, the parties also request that
10 **Special Condition 12 be removed.** The parties do not request a hearing in this matter in light of
11 this stipulation.
12

13
14 DATED: January 6, 2023

Respectfully submitted,
HEATHER E. WILLIAMS
Federal Defender

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16 /s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for JOSE CURIEL
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19 DATED: January 6, 2023

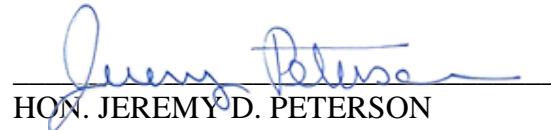
PHILLIP A. TALBERT
United States Attorney

21 /s/ Justin Lee
JUSTIN LEE
Assistant United States Attorney
Attorney for the United States
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~~PROPOSED~~ ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Amended Special Conditions of Release for defendant, Jose Curiel, are hereby adopted. Special Condition 14 shall be modified to reflect that Mr. Curiel shall be subject to a curfew from 6:00 p.m. to 6:00 a.m., daily. Special Condition 12 shall be removed. All other conditions of pretrial release shall remain in force.

DATED: January 9, 2023


HON. JEREMY D. PETERSON
United States Magistrate Judge